



AMERICAN SOCIETY OF HEMATOLOGY

2021 L Street, NW, Suite 900, Washington, DC 20036 **ph** 202.776.0544 **fax** 202.776.0545 **e-mail** ASH@hematology.org

December 20, 2019

Norman Sharpless, MD
Director, National Cancer Institute
National Institutes of Health
9609 Medical Center Drive
Bethesda, MD 20892-9760

Dear Dr. Sharpless,

As you are aware, the American Society of Hematology (ASH) recently sent a letter to President Trump expressing our concerns about a pending Executive Order on an open access publication policy being considered by the White House Office of Scientific and Technology Policy (OSTP). We wanted to take this opportunity to update you about a related matter regarding the National Cancer Institute's Moonshot Initiative and its open access policy.

First, let me commend Dr. Dinah Singer, who has been quite willing to listen to ASH's concerns about the Moonshot's open access policy. The policy states that research papers funded by NCI Moonshot (and HEAL) dollars be immediately open upon publication and published using a Creative Commons license (CC-BY) that allows full use of the content without the need to obtain permission. As we shared with Dr. Singer, ASH supports public access to scientific literature especially as it relates to a patient's clinical care or for individuals to use for their research or education; however, we are concerned about a Creative Commons license that allows use and modification of that publication for any purpose by anyone. This type of license removes an author's first line of defense in the instance of copyright infringement. We are also concerned that such a license could mean that critical dosing and medical information is available for misuse which in turn, could have negative public health implications. For these reasons, we asked the NCI policy to be revised to accept a Creative Commons license (CC-BY-NC-ND) that would allow for public access for all education initiatives and scientific research, but specifically not allow commercial exploitation or the creation of derivative products without permission. Dr. Singer conveyed ASH's concerns with the NCI Office of Data Sharing staff responsible for drafting the policy. She also assured us that the policy was intended to make publications immediately available to the research community, not to enable predatory uses.

The Society appreciates that NCI is receptive to adding clarifying language to its policy but remains concerned that a full understanding of the specific Creative Commons license identified in the latest language shared with ASH is not clear. Now that you are back at NCI, we would welcome the opportunity to provide you with additional information on the impact of open access on ASH's journals. We are committed to finding a business model that addresses the need to make scientific data readily available while maintaining robust peer review and content curation. We look forward to discussing potential resolutions with you and your staff.

Thank you for your consideration of our request. Please reach out to ASH's Chief Policy Officer, Suzanne Leous, MPA (202-292-0258 or sleous@hematology.org) as your point of contact on this matter. We look forward to hearing from you at your earliest convenience.

Sincerely,

A handwritten signature in black ink, appearing to be "Stephanie Lee".

Stephanie Lee, MD, MPH
President